



**ETCOR** Educational Research Center  
**PHILIPPINES**

Sta. Ana, Pampanga, Philippines



Website: <https://etcor.org>



**iJOINED ETCOR**  
**P-ISSN 2984-7567**  
**E-ISSN 2945-3577**



**The Exigency**  
**ISSN 1908-3181**

## Unveiling the Moral-Theological Foundations of the Nullity of Marriage Due to Psychological Incapacity

Richard D. Sanchez

University of the Assumption, City of San Fernando, Pampanga, Philippines

Corresponding Author email: [chardsanchez23@gmail.com](mailto:chardsanchez23@gmail.com)

**Received:** 11 February 2023

**Revised:** 05 March 2023

**Accepted:** 17 March 2023

**Available Online:** 19 March 2023

**Volume II (2023), Issue 1, P-ISSN – 2984-7567; E-ISSN - 2945-3577**

### Abstract

**Aim:** This qualitative study analyzed the morality of the use of the Article 36 of the Family Code of the Philippines, popularly known as the nullity of marriage due to psychological incapacity. Specifically, the use of the said civil provision was analyzed in the light of the three conditions set forth by the CCC: (1) the goodness of the object chosen, (2) the nobility of the intent, and (3) the goodness of the action in consideration of its various circumstances and consequences.

**Methodology:** The research employed the moral analysis method. Data were gathered through in-depth interviews either face-to-face or via electronic communication. Thirteen authorities agreed to participate in the study and were classified into three (3) groups: the Catholic Church people, legal experts, and psychologists. In view of the confidentiality clause in academic research, the identities of these participants are not revealed and are kept highly confidential.

**Results:** Overall findings show that the use of this provision on psychological incapacity is indeed morally and theologically upright. Through the responses of the participants in this study, the goodness of the Article 36 in terms of its object, its intent, and its nobility in view of the various circumstances surrounding its employment, was well established.

**Conclusion:** The Article 36 of the Family Code is morally and theologically upright despite the abuses in its use. The Catholic Church must guard such goodness, specifically in interpreting the psychological incapacity provision of the law.

**Keywords:** Marriage, Nullity, Psychological Incapacity, Moral Foundations, Theology

### INTRODUCTION

*"The following truth however should also be well noted: Just as what God has joined together as husband and wife, rests immune to mere human separating action, in the same vein, what however God has kept separate as man and woman likewise remains immune to mere human uniting action. This distinct truth is the primary and solid basis for the indissolubility of all valid conjugal unions – as well as for the nullity of any in fact invalid conjugal covenant, any in truth ab initio null spousal commitment."*

*+ Oscar V. Cruz, JCD, DD, 2006, p. 25*

The aforementioned statements seem to already provide an affirmative and a conclusive answer as to the inquiry on whether or not the provisions of both the Church and the State pertaining to the nullity of marriages may find their moral foundation, bases and rationale in no other than the Gospel itself. Despite of this seemingly affirmative and conclusive answer, however, there are still many areas and concerns that are still vague and are truly wanting of true, definitive answers as to the moral roots of the subject marriage nullity action, specifically the provision that was adopted from the Code of Canon Law and now being applied in the field of civil law – the Article 36 of the Family Code of the Philippines, popularly known as the nullity of marriage due to psychological incapacity. Here comes the inquiries on the following points: (1) Is reconciliation between this civil provision and the Catholic



**ETCOR Educational Research Center**  
**PHILIPPINES**  
 Sta. Ana, Pampanga, Philippines



Website: <https://etcor.org>



**iJOINED ETCOR**  
**P-ISSN 2984-7567**  
**E-ISSN 2945-3577**



**The Exigency**  
**ISSN 1908-3181**

moral and theological standards truly attainable?; and (2) Can this measure pronouncing certain marriages as null and void from the beginning by reason of either or both parties' incapacity to assume their essential marital obligations be really declared morally good in addition to its legitimacy?.

The significance and vital role of the institution of marriage as an 'inviolable social institution' is of paramount concern of every citizen, of all the faithful. The family life, the foundation of this nation, finds its security and safeguard in this covenant. Both the Church and the State, recognizing the marriage's indubitable value, have been continuously enacting and implementing measures to safeguard this institution. One of these measures is the above-mentioned provision on the nullity of certain marriages by reason of psychological incapacity. As previously mentioned, this provision is enacted under the Family Code of the Philippines. Despite this provision, among other various measures protecting the marriage and the family life as a whole, still abuses and other acts contrary to the upholding of the valuable institution of marriage continue to perpetrate. The subject Article 36 in particular is not exempt from these circumstances. The law itself, its interpretation and application, all of these are subject of various discourses pertaining to its nobility as applied and interpreted in the society. Just like any law or policy, when a provision or a program is not carefully reviewed, abuses or failure becomes a great possibility (Dizon & Sanchez, 2020; Sanchez & Sarmiento, 2020; Sanchez, 2023). In this study in particular, it is hoped that a vital aspect of the provision be discussed and be put into inquiry and scrutiny – the moral and theological aspects. This study recognizes that the moral and theological foundations or bases, or the lack or insufficiency thereof, of this provision are a concern of theology and the Catholic Church as a whole. The institution of marriage and the various measures enacted and being implemented for its protection call every faithful, every citizen, to deliberate, reflect and meditate as to whether or not these measures are grounded on morality and they truly uphold marriage as envisioned by the Church when they are interpreted and applied to humans.

This study introduces first the institution of marriage as valued, protected and understood in the Universal Church. The marriage as ordained by God Himself is the theme of this part. Then this will be followed by the Philippine State's actions and recognition of the marriage and the family life as an inviolable social institution and the foundation of the nation, respectively. The Constitutional guarantee of these principles will be dealt with at this point. It will be followed by the introduction of the Family Code of the Philippines as an implement or as an enabling law of the previously mentioned Constitutional guarantee. The Article 36 is then finally introduced as one of the provisions under the said Code, with the aim of inquiring into its moral bases or foundations in consideration of the standards set forth by the Catechism of the Catholic Church (CCC), in this case these are the constitutive elements of the morality of human actions: (1) the object chosen; (2) the intent; and (3) the moral goodness of the action in view of its circumstances and consequences.

#### *Marriage as a Covenant: Ordained by God*

In his book entitled *Why Marriages Fail: A Commentary on Incapacity for Marriage*, Lingayen, Dagupan Archbishop Emeritus Oscar V. Cruz (2006), the head of the National Appellate Matrimonial Tribunal (NAMT) of the Catholic Bishops' Conference of the Philippines (CBCP), affirmed that indeed marriage is ordained by God. Citing the Scriptures and two other significant documents – the Catechism of the Catholic Church (CCC) and the provisions of the present Code of Canon Law, he convincingly upheld the truth that this solemn union has no other Author but God Himself. In these three significant documents, he has given special attention to the following points:

#### *The Scriptures*

"Jesus said: Have you not heard the Scripture that says that in the beginning the Creator made people male and female? And God said: For this reason a man will leave his father and mother and will unite with his wife, and the two will become one. So they are no longer two, but one. Man must not separate wherefore what God has joined together." (Matthew 19:4-6)

#### *The Magisterium, citing the CCC*

"Sacred Scripture begins with the creation of man and woman in the image and likeness of God and concludes with the vision of 'the wedding feast of the Lamb'. Scripture speaks throughout of marriage as a 'mystery', its institution and the meaning God has given it, its origin and its finality, its various realizations through the history of salvation, the difficulties arising from sin and its renewal 'in the Lord' in the new Covenant and the Church." Citing CCC Nos. 1602-1603, Archbishop Emeritus Oscar Cruz continued,

"The intimate community of life and love which constitutes the married state has been established by the Creator and endowed by Him by its own proper laws. God Himself is the Author of marriage." He furthered, "The



**ETCOR** Educational Research Center  
**PHILIPPINES**

Sta. Ana, Pampanga, Philippines



Website: <https://etcor.org>



**iJOINED ETCOR**  
**P-ISSN 2984-7567**  
**E-ISSN 2945-3577**



**The Exigency**  
**ISSN 1908-3181**

vocation to marriage is written in the very nature of man and woman as they come from the hand of the Creator. Marriage is not a purely human institution despite the many variations it may have undergone through the centuries in many different cultures, social structures and spiritual attitudes.”

### *The Canon Law*

“The marriage covenant by which a man and a woman establish between themselves a partnership of their whole life, and which of its own very nature is ordered to the well-being of the spouses and to the procreation and upbringing of children, has, between the baptized, been raised by Christ the Lord to the dignity of a Sacrament.” (Canon 1055 CIC, Paragraph 1)

It is no other but God Himself who ordained and sanctified the marital covenant. The genuine nature of humans, that is – to love and to be in communion with others, is made concrete in the institution of marriage. Every person is made for another, to love and to take care, to be loved and to be taken care of. Every man is made to be of service and to be in a relationship to his neighbor. The marital commitment concretely manifests this relationship of being and becoming for the others. The Scriptures, the Catholic teachings and traditions also affirm the object of this solemn union.

According to Tamayo, et al. (2015), the marriage as the foundation of the family is indeed “a beautiful institution, one of the pearls of God’s creation (p. 56).”

Pope Francis, in his September 24, 2015 address to the members of the US Congress, once again reiterated the great significance of the family and the institution of marriage. Aware of the various threats that undermine the value of the family life, he said, “How essential the family has been to the building of this country! And how worthy it remains of our support and encouragement! (Marriage and family are being threatened.....)”.

This study is specifically concerned and “concentrated on a fundamental and crucial criterion of morality” (The Fonts of Morality). How can the morality and the theological bases of the Article 36 be determined? On what basis do people make their judgment? This is the insufficiency that this paper would like to undertake. This insufficiency, if not total absence as may be proven by some other studies or other concerned persons, of a specific study which main focus is the possible place of the Article 36 in the Catholic moral theology is now considered by this study as its possible contribution to the existing body of knowledge.

In the search for the subject provision’s foundations, if any, in the Catholic morality or Catholic theology, this study finds it fitting to employ the standards set forth by no other than the Catechism of the Catholic Church (CCC). The CCC 1750 enumerates three conditions by which a human act is morally evaluated. These three conditions, or “sources” of the morality of human acts as CCC calls them, are the following: (1) the object chosen or action in itself; (2) the intents or purposes of the action; and (3) the different circumstances surrounding the action and the consequences that resulted from its performance. According to the CCC, an action, which is a human act, is morally good if it passes these three conditions.

### **Objective**

This qualitative study analyzed the morality of the use of the Article 36 of the Family Code of the Philippines, popularly known as the nullity of marriage due to psychological incapacity. Specifically, the use of the said civil provision was analyzed in the light of the three conditions set forth by the CCC:

1. the goodness of the object chosen;
2. the nobility of the intent, and
3. the goodness of the action in consideration of its various circumstances and consequences.

### **METHODS**

#### **Research Design**

This study employed the qualitative type of research. Creswell (2007), citing Denzin and Lincoln, wrote that in qualitative research, the researchers place themselves into the world, interpreting and giving meaning certain phenomena as people provided to them. Interviews, conversations, and other means of communication may be used by the qualitative researchers to gather the data pertinent to their studies (Muñoz & Sanchez, 2023; Sanchez, 2022).



**ETCOR** Educational Research Center  
PHILIPPINES  
Sta. Ana, Pampanga, Philippines



Website: <https://etcor.org>



**iJOINED ETCOR**  
P-ISSN 2984-7567  
E-ISSN 2945-3577



**The Exigency**  
ISSN 1908-3181

### Participants

Thirteen authorities agreed to participate in the study and were classified into three (3) groups: the Catholic Church people, legal experts, and psychologists. In view of the confidentiality clause in academic research, the identities of these participants are not revealed and are kept highly confidential.

### Procedure

Data were gathered through in-depth interviews either face-to-face or via electronic communication. The instrument used was a semi-structured, open-ended interview guide validated by experts in the field of research.

### Ethical Consideration

All ethics in research were seriously considered and complied with in the conduct of this study.

### Data Analysis

The research employed the moral analysis method.

## RESULTS and DISCUSSION

### *The Article 36 of the Family Code of the Philippines: Fundamentally Rooted in Goodness*

The participants were asked to comment as to whether or not they believe that the Article 36 is morally good in consideration of its object chosen or the immediate action to which this provision is employed. Their opinions were considered in the resolution of the validity of the declaration or pronouncement of certain marriages as void ab initio using the power of the Article 36 of the Family Code in relation to the standards of the CCC, the object chosen test in particular. Related to this point is the concern on the action's effect to the marital life, specifically as to whether or not the use of this provision destroys this solemn union.

### *The Article 36 of the Family Code of the Philippines: The Nobility of its Intent*

This part deals with the participants' inputs as regards the second condition set forth by the CCC – the moral goodness and nobility of the action in consideration of its intents or ends. The participants were asked to comment as to whether or not the Article 36 is morally good in view of the very reasons of its enactment or adoption into the civil laws. They were asked to opine if the said provision, lifted from the Canon and adopted into the Family Code, is enacted to really advance the Church's and the State's mandate in upholding and strengthening the very foundation of this nation - the family and the institution of marriage.

### *The Article 36 of the Family Code of the Philippines: Moral Goodness Remains*

This part primarily presents the participants' input as to whether or not the Article 36 of the Family Code still remains morally good despite the different circumstances surrounding its use and the various consequences that resulted from such performance.

Basically rooted in their moral and legal obligations to uphold and protect real, valid marriages, the Church and the State have adopted measures that will enable them to fulfill these duties. With the reality of the different threats to the sacred institution of marriage, the Church and the State can neither set aside nor tolerate these alarming conditions against the very foundation of every nation. Fully aware of these conditions and admitting that "the family is the object of numerous forces that seek to destroy it, or in some way to deform it (Familiaris Consortio #3)", Pope John Paul II (1981) recognized the urgency and the compelling reasons to really take concrete actions to fulfill the Church's mission to once again elevate the family life and the institution of marriage to the great significance they truly deserve. Pope Francis also shares the same opinion. In fact, in his recent address to the US legislators, he said that indeed, the "marriage and family are being threatened (Marriage and family..., 2015)" nowadays. In the Church's mission to protect marriage and the family life, the role of the State cannot also be set aside. Pope Francis, in the same address to the US Congress, affirmed that indeed "each son or daughter of a given country has a mission, a personal and social responsibility" in protecting the family life. The Holy See reminded the US legislators that as citizens and public servants, and as the "basic role of all politics", their major role is to ensure the good of the society whose foundation is no other than the family. This study takes note of these as invitations for the full participation and harmony between the Church and the State on matters involving questions of morality and the good of the society and its sacred institutions, one of which is the sacred and solemn union in a marital life.

400



**ETCOR** Educational Research Center  
**PHILIPPINES**

Sta. Ana, Pampanga, Philippines



Website: <https://etcor.org>



**iJOINED ETCOR**  
**P-ISSN 2984-7567**  
**E-ISSN 2945-3577**



**The Exigency**  
**ISSN 1908-3181**

The inputs of the participants in this study, supported by pertinent records and jurisprudence, have proven that indeed the Church and the State have carefully discerned and exercised utmost prudence and wisdom in the creation and adoption of measures for the protection of the family life. In fact, a number of cases decided by no other than the Supreme Court of the Philippines and supported by the determination of the Church's matrimonial tribunals show the meticulous processes that the drafters of our laws have gone through in the adoption of these measures. The cases of Santos (1995) and of Molina (1997) are outstanding and are worthy to note. These cases, together with other controversial petitions filed before the Court and the Church's matrimonial tribunals, are proofs of the great wisdom that the State and the Catholic Church have employed in enacting said provisions. From the time that these measures were enacted up to now that the same are still maintained is a convincing evidence of the two bodies' firm stand for moral uprightness, and legitimacy in the civil aspect. This is not to discount certain abuses in the application of the said measures which, just like any laws, have certain vulnerability to be abused.

It is indeed worthy to note on this part that while both the Church and the State assert and uphold the sanctity of marriage as the "foundation of the family and an inviolable social institution (Family Code, Article 1)", and "as a covenant, by which a man and a woman establish between themselves a partnership of their whole life (CCC 1601)", both cannot have a blind eye to preserve and protect certain marriages which they both deem as void ab initio or null, inexistent from the very beginning. This reality is obviously manifested in the responses of the participants in this undertaking.

### Conclusion and Recommendations

For the State in general, that it reviews its system and the processes involved pertaining to the use of the psychological incapacity provision so the same may be protected from various forms of abuses and maintain the legal and moral goodness that is originally engraved in this law.

The State has to review its system and the processes it implements pertaining to the use of the psychological incapacity provision so the same may be protected from various forms of abuses and maintain the legal and moral goodness that is originally engraved in this law.

Most of the participants believe that the State is doing its parts to protect the use of all provisions pertaining to the family life. On the Article 36 in particular, these participants agree that concrete actions are done by the Supreme Court of the Philippines to monitor and urgently act on all cases handled and actions done by the lower courts. The said participants, however, also agree that such actions are insufficient. One participant, Legal Expert 2, commented that there is not really support from the other branches of the government which, he said, is very vital in this concern.

Indeed, the State needs to review its system and the processes it implements pertaining to the use of the psychological incapacity provision and other similar provisions so the same may be protected from various forms of abuses and maintain the legal and moral goodness that is originally engraved in them.

The study recognizes the great necessity for all nullity cases to really be elevated to the higher courts, to the CA and SC, for collegiate decision. Without these cases being elevated to the CA and to the SC, abuses will be inevitable. It's either the Regional Trial Court (RTC) judge arbitrarily decides on the case or in good faith, he pronounces a decision that would offend the very foundation of this nation.

As regards the opinion of Church Authority 1 for the State to really give great respect to the determination of the Catholic Church's matrimonial tribunals, the study fully agrees. To protect the moral goodness of the Article 36, the Church must be first and foremost the one that has to decide with finality on all cases pertaining to this provision. The study is convinced and now adopts the principle that "what is canonically pronounced must also be civilly declared". It is the study's conviction and now a recommendation in this study that decisions or judgments made by the matrimonial tribunals be recognized in the civil courts. It finds it unnecessary for couples who have already secured a decision from the matrimonial tribunals to still petition the civil courts to have a similar pronouncement. The study agrees that the wisdom and discernment by the Catholic Church are sufficient enough to truly protect the institution of marriage. The Church does not deserve to be offended by the civil courts' eventual reversal of the former's findings.

With regard to the recommendations of two participants, Church Authority 1 and Church Authority 2, as to the test on a person's psychological capacity before contracting a marriage, the study appreciates the same and even considers it as a possibility. However, after a review of the provision on psychological incapacity, the study finds that first and foremost this provision recognizes a scenario where such incapacity manifests only after the solemnization of the marriage. The Article 36 provides that, "A marriage contracted by any party who, at the time of the celebration, was psychologically incapacitated to comply with the essential marital obligations of marriage, shall

401



**ETCOR** Educational Research Center  
**PHILIPPINES**

Sta. Ana, Pampanga, Philippines



Website: <https://etcor.org>



**iJOINED ETCOR**  
**P-ISSN 2984-7567**  
**E-ISSN 2945-3577**



**The Exigency**  
**ISSN 1908-3181**

likewise be void even if such incapacity becomes manifest only after its solemnization. (Emphasis supplied)" Records and jurisprudence show that this 'after its solemnization' part of this provision is the one that usually takes place. This only means that the idea of psychological capacity test before the marriage, while the same is good, cannot be done since the Article 36 itself talks about a situation that, although already present before or at the moment of the marriage celebration, may manifest only after that celebration. Additionally, although the study finds this one a weak argument, to test a person for psychological capacity is to undermine the presumption that every person is normal, that every person is capacitated to perform certain obligations in the marital life. Having said all of these, with all due respect to the two participants named above, the study cannot adopt their recommendation that a person, before contracting a marriage, has to pass first a test on psychological capacity. The study places much weight on the first reason it gave.

One action which the study finds viable is for the government to assign a psychologist for each and every nullity case. This is a good start to stop or alleviate the allegations that some psychologists or clinical experts are being paid or are involved in the money-making scheme out of the nullity cases. Most of the participants agree that indeed there is a corruption taking place involving some psychologists or clinical experts. Most of them agree that some of these experts already have predetermined assessments of their patients' psychological constitution and these assessments, of course, may or may not be favorable to a nullity declaration depending on the necessity of the ones who paid the psychologists. So to prevent this scenario, this very saddening situation, the researcher now recommends that the government has to have recognized psychologists or clinical experts who shall be exclusively assigned on cases pertaining to marriage, with special attention to the cases involving the psychological incapacity provision of the Family Code. In fact, one participant, Legal Expert 5, believes that the lack of the government's recognized psychologists is indeed something that needs to be reviewed. He is aware that since the couple can hire any psychologists at their whim, the said choice of these experts becomes a means to abuse or undermine the nullity process.

For the Church, it is recommended that it assists and prays for the State, its partner to which it walks in harmony, to which the legal and moral aspects intersect and walk as one, and make the latter realize the urgent necessity to identify concrete actions so that the provisions specifically enacted for the protection of the institution of marriage, like the Article 36, be preserved and be implemented with utmost respect to their genuine intents and the spirit that inspired their enactment.

The study recommends that the Church assist the State to realize the urgent necessity to identify concrete actions so that the provisions specifically enacted for the protection of the institution of marriage, like the Article 36, be preserved and be implemented with utmost respect to their genuine intents and the spirit that inspired their enactment.

It is not concealed that the Article 36 is a provision that is rooted in the Code of Canon Law of the Catholic Church. In fact, a number of decisions by the civil courts, the Supreme Court in particular, have recognized this. By the very nature and history of the Article 36, it can be concluded, therefore, that this provision can only be fully understood in the light of the wisdom and discernment of its origin, the Catholic Church. And so, more than the persuasive effect and the great respect accorded to the judgment of the Catholic Church on cases pertaining to this provision, the researcher believes and recommends that the Church has to have more participation and assistance to the civil courts on the subject matter. While there is not yet a law recognizing in the civil courts the determination of the Church's matrimonial tribunals, the vital participation of the Church for now is deemed to substitute for the said insufficiency. The judges in the civil courts, in recognition of the assistance and prayer that the Church offers, should forget their mentality that the Church's determination are not binding, that these judges can just decide based on the pieces of evidence presented to them, or worse based on their arbitrary determination.

While most of the participants believe that the Church is very vigilant and extra careful in rendering decisions pertaining to the counterpart canonical provision of the Article 36, they should not forget that in the civil courts, where the system needs true healing and repair, is the presence of a number of petitioners wanting their marriages be declared void. And so the civil courts really need the prayer for discernment that they may not in good faith destroy the very foundation of this nation.



**ETCOR** Educational Research Center  
**PHILIPPINES**  
Sta. Ana, Pampanga, Philippines



Website: <https://etcor.org>



**iJOINED ETCOR**  
**P-ISSN 2984-7567**  
**E-ISSN 2945-3577**



**The Exigency**  
**ISSN 1908-3181**

## REFERENCES

- A nation of mercy and compassion. Retrieved September 11, 2015 from <http://www.cbcnews.com/cbcnews/?p=37961>
- Almenor vs. Almenor, G.R. No. 179620, August 26, 2008
- Anonymous vs. Radam, A.M. No. P-07-2333, December 19, 2007
- Antonio vs. Reyes, G.R. No. 155800, March 10, 2006
- Bacareza, H. E. (1999). *Psychological Incapacity, A Gift from Heaven?*. Manila, Philippines: University of Sto. Tomas' Faculty of Canon Law
- Baccay vs. Baccay, G.R. No. 173138, December 1, 2010
- Balajadia, D. M. (2012). *Leadership in Teacher Education Institutions from the Lens of Outstanding Teacher Graduates*. University of the Assumption, Pampanga: Ad Meliora Research Journal
- Beal, John P., Coriden, James A. and Green, Thomas Joseph Green (2000). *New Commentary on the Code of Canon Law*. USA: Paulist Press
- Butler, M. E. (1995). *Psychological Incapacity for Marriage and the Survivor of Incest*. Portland, OR: TREN.
- Catechism of the Catholic Church Nos. 1602-1603, 1731, 1749-1756, 2464
- Charmazz, K. (2014). *Constructing Grounded Theory*, 2nd edition. London: SAGE Publications, Ltd.
- Chi Ming Tsoi vs. Court of Appeals, G. R. No. 119190, January 16, 1997
- Choa vs. Choa, G.R. No. 143376, November 26, 2002
- Coram, E. G. (2002, February 7). SRRD Vol. XCIV, pp. 56-63, Lib. Ed. Vaticana 2010
- Coram, P. I. M. (1953, January 22). RR, pp. 52-58, December 1945
- Coriden, J. A., Green, T. J., and Heintschel, D. E., eds. (1985). *The Code of Canon Law: A Text and Commentary*. New York: Paulist Press
- Creswell, J. W. (2007). *Qualitative Inquiry and Research Design: Choosing Among Five Approaches*, 2nd edition. Thousand Oaks, CA: SAGE Publications, Inc.
- Cruz, O. V. (2007). *Before and Beyond "I Do"*. Matrimonial Advisories. Manila, Philippines: CBCP Communications Development Foundation, Inc.
- Cruz, O. V. (2008). *Charter of Family Rights*. Manila, Philippines: CBCP Communications Development Foundation, Inc.
- Cruz, O. V. (2002). *Evidence in Marriage Nullity Cases*. Dagupan City: ALD Publications
- Cruz, O. V. (2014) *Marriage, Renewable Marriage Contract, Divorce, Same Sex Marriage, Group Marriage*. Manila, Philippines: CBCP Communications Development Foundation, Inc.
- Cruz, O. V. (2012). *Want to Get Married?* Manila, Philippines: CBCP Communications Development Foundation, Inc.



**ETCOR** Educational Research Center  
**PHILIPPINES**

Sta. Ana, Pampanga, Philippines



Website: <https://etcor.org>



**iJOINED ETCOR**  
**P-ISSN 2984-7567**  
**E-ISSN 2945-3577**



**The Exigency**  
**ISSN 1908-3181**

- Cruz, O. V. (2006). *Why Marriages Fail: A Commentary on Incapacity for Marriage*. Dagupan City: ALD Publications
- Denzin, N. K., & Lincoln, Y. S. (2005). *SAGE Handbook of Qualitative Research*, 3rd edition. London: SAGE Publications, Ltd.
- Dizon, E. C., & Sanchez, R. D. (2020). Improving select grade 7 Filipino students' reading performance using the eclectic model. *Journal of World Englishes and Educational Practices*, 2(2), 216-221.
- Divorce. Retrieved September 26, 2015 from <http://www.cbcnews.com/cbcnews/?p=12018>
- Divorce bill good scapegoat for couples – CBCP. Retrieved September 27, 2015 from <http://www.philstar.com/headlines/2015/03/28/1438366/divorce-bill-good-scapegoat-couples-cbc>
- Estrada vs. Escritor, A.M. No. P-02-1651, June 22, 2006
- Family Code of the Philippines, Article 1, 35-38
- Muñoz, M. C., & Sanchez, R. D. (2023). Exploring Fernandino Teens TV as a supplementary learning delivery modality: Opportunities and challenges from the lens of select learners. *International Journal of Open-access, Interdisciplinary and New Educational Discoveries of ETCOR Educational Research Center (iJOINED ETCOR)*, 2(1), 358-374.
- Sanchez, A. M. P. (2022). HR practitioners' perceptions on boosting employees' loyalty and commitment: Inputs for a 21st century-responsive human resource system. *International Journal of Open-access, Interdisciplinary and New Educational Discoveries of ETCOR Educational Research Center (iJOINED ETCOR)*, 1(4), 89-102.
- Sanchez, R. (2023). Utilization of the daily lesson logs: An evaluation employing the CIPP model. *International Journal of Open-access, Interdisciplinary and New Educational Discoveries of ETCOR Educational Research Center (iJOINED ETCOR)*, 2(1), 199-215.
- Sanchez, R., & Sarmiento, P. J. (2020). Learning together hand-in-hand: An assessment of students' immersion program in a schools division. *International Journal of Research Studies in Education*, 9(1), 85-97.
- Sanchez, R., Sarmiento, P. J., Pangilinan, A., Guinto, N., Sanchez, A. M., & Sanchez, J. J. (2022). In the name of authentic public service: A descriptive phenomenological study on the lives of Filipino teachers in select coastal villages. *International Journal of Open-access, Interdisciplinary and New Educational Discoveries of ETCOR Educational Research Center (iJOINED ETCOR)*, 1(1), 35-44.